

1 **Thomas P. Riley, SBN 194706**
2 **LAW OFFICES OF THOMAS P. RILEY, P.C.**
3 **First Library Square**
4 **1114 Fremont Avenue**
5 **South Pasadena, CA 91030-3227**

6 **Tel: 626-799-9797**
7 **Fax: 626-799-9795**
8 **TPRLAW@att.net**

9 **Attorneys for Plaintiff**
10 **J & J Sports Productions, Inc.**

11 **UNITED STATES DISTRICT COURT**
12 **NORTHERN DISTRICT OF CALIFORNIA**
13 **SAN FRANCISCO DIVISION**

14 **J & J SPORTS PRODUCTIONS, INC.,**

15 **Plaintiff,**

16 **v.**

17 **MELVA A. GAMEZ URIAS a/k/a MELVA**
18 **A. GAMEZ,**

19 **Defendant.**

20 **CASE NO. 3:14-cv-03941-SC**

21 **PLAINTIFF'S *EX PARTE***
22 **APPLICATION FOR AN ORDER**
23 **CONTINUING THE CASE**
24 **MANAGEMENT CONFERENCE; AND**
25 **ORDER (~~Proposed~~)**

26 **TO THE HONORABLE SAMUEL CONTI, THE DEFENDANT AND HER**
27 **ATTORNEY/S OF RECORD:**

28 Plaintiff J & J Sports Productions, Inc., hereby applies *ex parte* for an order continuing the Case Management Conference presently set for Friday, December 5, 2014 at 10:00 AM. As set forth below Plaintiff respectfully requests that the Court continue the Case Management Conference to a new date approximately Thirty (30) to Forty-Five (45) days forward.

The request for the brief continuance is necessitated by the fact that Plaintiff has not yet perfected service of the initiating suit papers upon the Defendant Melva A. Gamez Urias a/k/a Melva A. Gamez, individually and d/b/a El Mexicano Bar. As a result, Plaintiff's counsel has not conferred with the defendant concerning the claims, discovery, settlement, ADR or any of the other pertinent issues involving the case itself or the preparation of a Joint Case Management Conference Statement.

///

1 Plaintiff recently identified an alternative address that it believes will be successful to serve
2 its initiating suit papers, upon the Defendant.

3 In addition, Thomas P. Riley, Plaintiff's counsel in this action, has calendaring conflicts on
4 Friday, December 5, 2014 as Mr. Riley is scheduled to personally appear before Mediator Gail
5 Killefer, ADR Program Director of the U.S.D.C. for the Central District of California, Western
6 Division in the matters of *J & J Sports Productions, Inc. v. Lim, et al.*,; Case No. 2:13-cv-8949-WDK-
7 PLA for a mediation at 9:00 AM that very same day (ECF# 12); and for a telephonic settlement
8 disposition conference in *J & J Sports Productions, Inc. v. Buenrostro, et al.*,; Case No. 3:13-cv-02104-
9 CAB-KSC at 10:00 A.M. that same day (ECF# 20); and for a case management conference in *J & J*
10 *Sports Productions, Inc. v. Pepperell, et al.*,; Case No. 3:14-cv-03923-MMC at 10:30 A.M. that same
11 day (ECF# 11)¹; and for a mediation in *J&J Sports Productions, Inc. v. Jaculito Lopez, Inc.*,; Case No.
12 2:13-cv-08877-WDK-PLA at 11:00 AM that same day (ECF# 16); and for a mediation in *J & J Sports*
13 *Productions, Inc. v. Gebreyesus, et al.*,; Case No. 2:13-cv-09087-WDK-PLA at 12:00 PM that same
14 day (ECF# 15); and for a mediation in *J&J Sports Productions, Inc. v. Vasquez, et al.*,; Case No. 5:13-
15 cv-00807-WDK-PLA at 1:00 PM that same day (ECF# 22); and for a mediation in *J & J Sports*
16 *Productions, Inc. v. Jimenez*,; Case No. 2:13-cv-08860-WDK-PLA at 2:00 PM that same day (ECF#
17 14) as well.

18 **WHEREFORE**, Plaintiff respectfully requests that this Honorable Court continue the Case
19 Management Conference, presently scheduled for Friday, December 5, 2014 at 10:00 AM.

20
21 Respectfully submitted,

22
23
24
25 Dated: November 25, 2014

/s/ Thomas P. Riley

LAW OFFICES OF THOMAS P. RILEY, P.C.

By: Thomas P. Riley

Attorneys for Plaintiff

J & J Sports Productions, Inc.

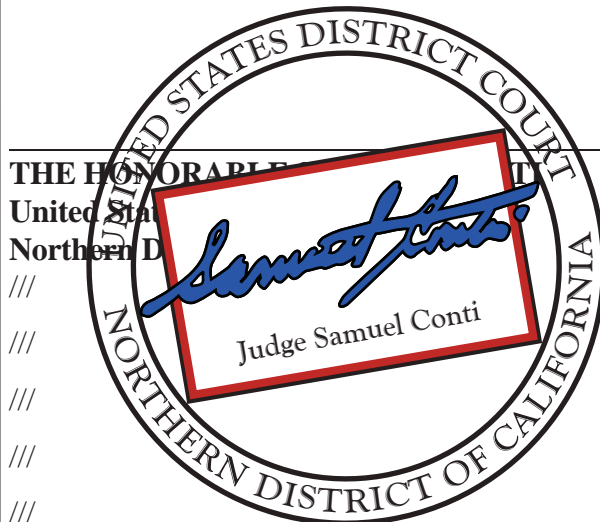
26
27
28
¹ Plaintiff's counsel will be requesting a rescheduling of this particular matter in view of the seven (7) other proceedings
(as set forth above) on calendar that same day.

ORDER (~~Proposed~~)

It is hereby ordered that the Case Management Conference in civil action number 3:14-cv-03941-SC styled *J & J Sports Productions, Inc. v. Urias*, is hereby continued from 10:00 AM, Friday, December 5, 2014 to Friday, January 16, 2015, at 10:00 AM.

Plaintiff shall serve a copy of this Order on the Defendant and thereafter file a Certification of Service of this Order with the Clerk of the Court.

IT IS SO ORDERED:



Dated: 11/25/2014

PROOF OF SERVICE (SERVICE BY MAIL)

I declare that:

I am employed in the County of Los Angeles, California. I am over the age of eighteen years and not a party to the within cause; my business address is 1114 Fremont Avenue, South Pasadena, California. I am readily familiar with this law firm's practice for collection and processing of correspondence/documents for mail in the ordinary course of business.

On November 25, 2014, I caused to serve the following documents entitled:

PLAINTIFF'S *EX PARTE* APPLICATION FOR AN ORDER CONTINUING THE CASE MANAGEMENT CONFERENCE; AND ORDER (Proposed)

On all parties in said cause by enclosing a true copy thereof in a sealed envelope with postage prepaid and following ordinary business practices, said envelope was addressed to:

Melva A. Gamez Urias a/k/a Melva A. Gamez (Defendant)
1835 23rd Street
San Pablo, CA 94806

The fully sealed envelope with pre-paid postage was thereafter placed in our law firm's outbound mail receptacle in order that this particular piece of mail could be taken to the United States Post Office in South Pasadena, California later this day by myself (or by another administrative assistant duly employed by our law firm).

I declare under the penalty of perjury pursuant to the laws of the United States that the foregoing is true and correct, and that this declaration was executed on November 25, 2014, at South Pasadena, California.

Dated: November 25, 2014

/s/ Vanessa Morales
VANESSA MORALES